

EXHIBIT

A

Date of Filing: 02/28/2023 Judge Code:

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

SKY KING SATELLITE, INC.,)
)
 Plaintiff,)
)
v.)
)
ELITE TECHNICIAN)
MANAGEMENT GROUP, LLC,)
)
 Defendant.)

Case No.: CV-2023-_____

Jury Trial Demanded

COMPLAINT

COMES NOW the Plaintiff, Sky King Satellite, Inc., by and through its undersigned attorney of record, and would show this Honorable Court as follows:

Parties

1. Plaintiff Sky King Satellite, Inc., is a corporation formed and existing under the laws of the State of Pennsylvania.

2. Defendant, Elite Technician Management Group, LLC, is a foreign limited liability company, formed and existing under the laws of the State of Louisiana, doing business in the State of Alabama. Defendant has had sufficient minimum contacts in the State of Alabama to be subject to the jurisdiction of this Court.

Factual Allegations

3. Plaintiff expressly adopts as if set forth herein the allegations of ¶¶ 1-2 above.

4. Prior to January 15, 2023, Defendant entered into a contractual agreement with Spectrum/Charter Cable for

certain work to be performed in the State of Alabama.

5. On or about January 15, 2023, in furtherance of its contractual agreement with Spectrum/Charter Cable, Defendant contracted with Plaintiff for the installation of aerial and/or underground construction services in Alabama ("the Contract").

6. Plaintiff provided services in the State of Alabama pursuant to the Contract from on or about January 16, 2023, through on or about January 27, 2023.

7. Defendant has failed to compensate Plaintiff for services performed pursuant to the Contract, in the approximate sum of \$686,000.00.

Count I - Breach of Contract

8. Plaintiff expressly adopts as if set forth herein the allegations of ¶¶ 1-7 above.

9. Defendant breached the Contract in failing/ refusing to compensate Plaintiff for services rendered pursuant to the Contract.

10. Plaintiff fully performed under the Contract.

11. As a direct and proximate result of Defendant's breach of the Contract, Plaintiff have suffered injury/damage, to include but not limited to economic loss, attorney fees, etc.

WHEREFORE, THE PREMISES CONSIDERED, Plaintiff demands

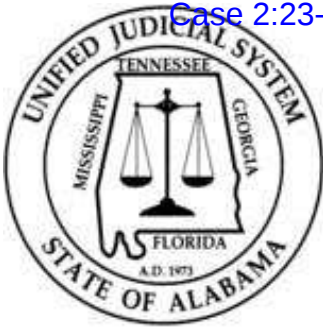
judgment against Defendant for compensatory damages in an amount in excess of the sum of \$686,000, interest allowed by law, attorney fees, and such other relief as may be just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY

/s/ Jerry M. Blevins
JERRY M. BLEVINS (BLE003)
Counsel for Plaintiff

OF COUNSEL:

Law Office of Jerry M. Blevins
Hillwood Office Center
2800 Zelda Road, Suite 200-3
Montgomery, Alabama 36106
(334) 262-7600 (Voice)
Email: ATTYJMBlev@LawOfficeOfJerryMBlevins.com



AlaFile E-Notice

03-CV-2023-900256.00

To: Jerry M Blevins
ATTYJMBlev@LawOfficeOfJerryMBlevins.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

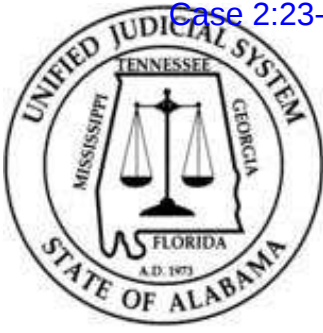
SKY KING SATELLITE, INC. V. ELITE TECHNICIAN MANAGEMENT GROUP, LLC
03-CV-2023-900256.00

The following complaint was FILED on 2/28/2023 7:42:14 AM

Notice Date: 2/28/2023 7:42:14 AM

GINA J. ISHMAN
CIRCUIT COURT CLERK
MONTGOMERY COUNTY, ALABAMA
251 S. LAWRENCE STREET
MONTGOMERY, AL, 36104

334-832-1260



AlaFile E-Notice

03-CV-2023-900256.00

To: ELITE TECHNICIAN MANAGEMENT GROUP, LLC
C/O TRAVIS BORN
56707 BEHRMAN STREET
SLIDELL, LA, 70458

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

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03-CV-2023-900256.00

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State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 03-CV-2023-900256.00
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IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA
SKY KING SATELLITE, INC. V. ELITE TECHNICIAN MANAGEMENT GROUP, LLC

NOTICE TO: ELITE TECHNICIAN MANAGEMENT GROUP, LLC, C/O TRAVIS BORN 56707 BEHRMAN STREET, SLIDELL, LA 70458

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),

Jerry M Blevins _____

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 2800 Zelda Road, Suite 200-3, Montgomery, AL 36106

[Address(es) of Plaintiff(s) or Attorney(s)]

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____

[Name(s)]

02/28/2023 _____ /s/ GINA J. ISHMAN By: _____

(Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested. _____

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____

in _____ County,

(Name of Person Served) (Name of County)

Alabama on _____

(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)

(Phone Number of Server)



State of Alabama
Unified Judicial System
Form C-34 Rev. 4/2017

SUMMONS
- CIVIL -

Court Case Number
03-CV-2023-900256.00

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA
SKY KING SATELLITE, INC. V. ELITE TECHNICIAN MANAGEMENT GROUP, LLC

NOTICE TO: ELITE TECHNICIAN MANAGEMENT GROUP, LLC, C/O TRAVIS BORN 56707 BEHRMAN STREET, SLIDELL, LA 70458

(Name and Address of Defendant)

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Jerry M Blevins

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 2800 Zelda Road, Suite 200-3, Montgomery, AL 36106

[Address(es) of Plaintiff(s) or Attorney(s)]

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pursuant to the Alabama Rules of the Civil Procedure.

[Name(s)]

02/28/2023

(Date)

/s/ GINA J. ISHMAN

(Signature of Clerk)

By:

(Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
Katy F _____ in Saint Tammany _____ County,
(Name of Person Served) *(Name of County)*

Alabama on 1st day of March, 2023
(Date)

1042 St Scholastica St, Slidell, LA

70460
(Address of Server)

Private
(Type of Process Server)

(Server's Signature)

Jessica Warren
(Server's Printed Name)

803-814-3815
(Phone Number of Server)

03-CV-2023-900256.00

SKY KING SATELLITE, INC. V. ELITE TECHNICIAN MANAGEMENT GROUP, LLC

C001 - SKY KING SATELLITE, INC.

(Plaintiff)

v.

D001 - ELITE TECHNICIAN MANAGEMENT GROUP, LLC

(Defendant)



SERVICE RETURN COPY



0101981636



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY ALABAMA

SKY KING SATELLITE, INC.

Plaintiff/Petitioner

Case Number: 03-CV-2023-900256.00

Hearing Date:

vs.

Elite Technician management Group, LLC

Defendant/Respondent

Affidavit of Service of: NOTICE OF ELECTRONIC
FILING; SUMMONS; COMPLAINT; COVER SHEET
CIRCUIT COURT - CIVIL CASE

Received by **Jessica Warren**, on the **28th day of February, 2023 at 3:18 PM** to be served upon **Elite Technician management Group, LLC c/o Travis Born, Registered Agent at 56707 Behrman Street, Slidell, Saint Tammany County, LA 70458.**

On the **1st day of March, 2023 at 12:42 PM** I, **Jessica Warren**, SERVED **Elite Technician management Group, LLC c/o Travis Born, Registered Agent** at the address of **56707 Behrman Street, Slidell, Saint Tammany County, LA 70458** via PERSONAL SERVICE, by personally delivering the service, description as follows:

KATY F, who accepted service with identity confirmed by subject stating their name, **I delivered the documents to Katy F who indicated they were the person authorized to accept with identity confirmed by subject stating their name. The individual accepted service with direct delivery. The individual appeared to be a black-haired white female contact 45-55 years of age, 5'4"-5'6" tall and weighing 140-160 lbs., A PERSON OF SUITABLE AGE AND DISCRETION** who stated they reside at the defendant's/respondent's usual place of abode listed above.

I am a citizen of the United States, over the age of nineteen, not a party to nor interested in the above entitled action and have the proper authority in the jurisdiction in which this service was made and I meet the requirements of Rule 4(i)(1)(B). Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true and accurate.

Name:-----

Jessica Warren
; 1042 St Scholastica St
Slidell, LA 70460

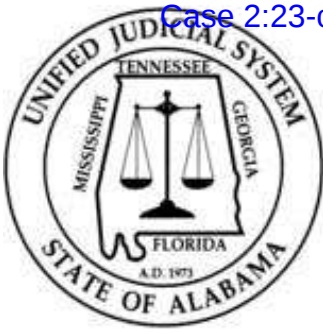
Server ID#

03/01/2023

Date:

Tracking #: 0102049856





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ATTYJMBlev@LawOfficeOfJerryMBlevins.com

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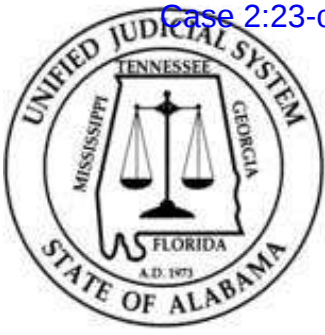
SKY KING SATELLITE, INC. V. ELITE TECHNICIAN MANAGEMENT GROUP, LLC
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The following RETURN ON SERVICE - SERVED was FILED on 3/1/2023 12:51:26 PM

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MONTGOMERY COUNTY, ALABAMA
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MONTGOMERY, AL, 36104

334-832-1260



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To: ELITE TECHNICIAN MANAGEMENT GROUP, LLC (PRO SE)
C/O TRAVIS BORN
56707 BEHRMAN STREET
SLIDELL, LA, 70458-0000

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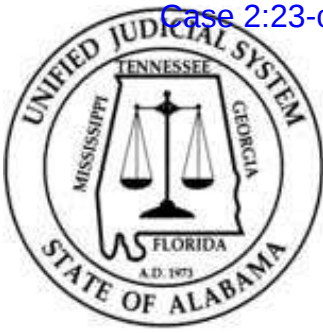
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